

### The Drawings

In item 1 on page 2 of the Office Action the Examiner objected to the drawings on the basis that the reference character 56 was used to designate two separate items in the drawings. Applicants are submitting herewith a Letter to the Examiner which both requests approval of corrected drawings and submits a formal corrected drawing making these corrections.

In making the drawing corrections it was noted that certain corresponding changes were required in the specification. Accordingly, a substitute specification is being submitted herewith. In addition, a marked up copy of the specification showing the changes is also attached.

### Rejection Under 35 U.S.C. § 102

In items 2 and 3 on pages 2-4 of the Office Action the Examiner has rejected claim 10 under 35 U.S.C. § 102 over U.S. Patent 5,805,412 to Yanagisawa et al. In particular, the Examiner takes the position that the docking unit 200 in Yanagisawa et al. is a port replicator having a third connection part 222 connected to the connector 321 of the function expanding device 300. In item 8 on page 6 of the Office Action, the Examiner takes the position that the claim language uses the term "connectable" which implies the ability to connect, as opposed to a connection. The Examiner takes the position that the apparatus of Yanagisawa et al. teaches such "connectable" connector parts.

Claim 10 as amended recites a port replicator which is "detachably" connectable to a function expanding device and further recites that the operation part enables the "user to drive the unit independent of driving the unit by the electronic hardware." Thus, claim 10 as amended recites "a port replicator detachably connectable to a function expanding device", wherein the function expanding device includes "an operation part that enables the user to drive the unit independent of driving the unit by the electronic hardware" and wherein the function expanding device includes "a third connection part connectable to the second connection part of the function expanding device." These features are not taught or suggested by Yanagisawa et al., therefore it is submitted that claim 10 patentably distinguishes over the prior art.

### Rejections Under 35 U.S.C. § 103

In items 5 and 6 on pages 4-6 of the Office Action the Examiner has rejected claims 1-9 and 11-13 as unpatentable over U.S. Patent 6,064,566 to Agata et al. in view of one or both of U.S. Patent 6,134,376 to Lee et al. and U.S. Patent 5,460,547 to Belt et al.

Claim 1

In the response to the prior Office Action the applicants urged that the prior art did not disclose an operation part that enables the user to drive a unit independent of driving a unit by the electronic hardware. Applicants urged that none of the prior art devices enable a user to drive a unit which expands a function of electronic hardware independent of driving the unit by the electronic hardware. In the current Office Action the Examiner has not supplied any prior art disclosing the above feature but instead takes the following position:

“...it is well known in the art for a drive unit of any kind to have at least one control part, such as a play, an on/off, an eject, and/or open/close key. It is also well known in the art for a computer system and/or a drive unit to have circuitry inherent to the system used for operating the drive unit such as a processor and data bus lines.”

Claim 1 has been amended to recite “a housing forming said first and second connection parts.”

In Agata et al. the first and second connection parts (412, 414, 420, 432, 534) are provided in separate members. In contrast, claim 1 as amended specifies a housing that forms the first and second connection parts. This feature provides significant advantages by providing space savings and miniaturization of the device.

In Lee et al., the VCR 9 does not work without the personal computer because the personal computer powers the VCR 9. On the other hand, claim 1 recites that “an operation part enables a user to drive the unit independent of driving the unit by the electronic hardware.” This difference is also significant, for example, for the reasons set forth at page 5, lines 9-25 of the subject application. Thus, even if Agata et al. could have been combined with Lee et al., the prior art would not teach or suggest a “housing forming said first and second connection parts” and “an operation part that enables a user to drive the unit independent of driving the unit by the electronic hardware” as recited in claim 1.

In addition to the above, applicants challenge the Examiner’s assertion that the claimed feature “an operation part that enables a user to drive the unit independent of driving the unit by the electronic hardware” is well known. The only prior art developed by the Examiner does not disclose this feature. Therefore, it is requested that the Examiner provide prior art references showing this teaching.

Claim 11

Claim 11, as amended, recites "a housing performing said first, second and third connection parts". Therefore, it is submitted that claim 11 patentably distinguishes over the prior art.

Claims 2-9 and 12-13

The above claims depend, directly or indirectly, from claim 1 or claim 11 and include all of the features of the claim from which they depend, plus additional features which are not taught or suggested by the prior art. Therefore, it is submitted that these claims also patentably distinguish over the prior art.

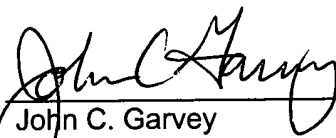
Summary

It is submitted that none of the references, either taken alone or in combination, teach the present claimed invention. Thus, claims 1-13 are deemed to be in a position suitable for allowance. Reconsideration of the claims and an early notice of allowance are respectfully submitted.

Respectfully submitted,

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**VERSION WITH MARKINGS TO SHOW CHANGES MADE**

**IN THE SPECIFICATION:**

Please REPLACE the specification with the attached substitute specification. A marked-up copy of the substitute specification is also attached.

**IN THE CLAIMS:**

Please AMEND the following claims:

1. (TWICE AMENDED) A function expanding device comprising:  
a first connection part connectable to a unit which expands a function of electronic hardware;  
a second connection part connectable to the electronic hardware; [and]  
an operation part that enables a user to drive the unit independent of driving the unit by the electronic hardware[.]; and  
a housing forming said first and second connection parts.
2. (UNAMENDED) A function expanding device according to claim 1, further comprising a control part which may control the unit independent of the electronic hardware.
3. (UNAMENDED) A function expanding device according to claim 1, wherein said operation part may power on at least part of the electronic hardware.
4. (UNAMENDED) A function expanding device according to claim 2, wherein said control part may transmit operational information of the operation part to the electronic hardware.
5. (ONCE AMENDED) A function expanding device according to claim 1, wherein said second connection part is connectable to a port replicator, and connectable to the electronic hardware via the port replicator.
6. (UNAMENDED) A function expanding device according to claim 1, wherein said second connection part has a cable.

7. (UNAMENDED) A function expanding device according to claim 1, further comprising  
a display part which displays a status of the unit.

8. (UNAMENDED) A function expanding device according to claim 1, wherein the unit is selected from a group including a music CD drive, a CD-ROM drive, a DVD-ROM drive, and an LS-120 drive, and said first connection part has a bay structure connectable compatibly to either drive in the group.

9. (UNAMENDED) A function expanding device according to claim 1, wherein said second connector has an IDE interface and a music interface.

10. (TWICE AMENDED) A port replicator detachably connectable to a function expanding device which includes a first connection part connectable to a unit which expands a function of electronic hardware, a second connection part connectable to the electronic hardware, and an operation part [of the unit] that enables a user to drive the unit independent of driving the unit by the electronic hardware, said port replicator comprising:

a third connection part connectable to the second connection part of the function expanding device; and

a fourth connection part connectable to the electronic hardware.

11. (TWICE AMENDED) A function expanding device comprising:  
a first connection part connectable selectively to a plurality of units each of which expands a function of electronic hardware;  
a second connection part connectable to the electronic hardware; [and]  
a third connection part connectable to the electronic hardware, said third connection part being used to connect at least one of said plurality of units to the electronic hardware, and said second connection part being used to connect the rest of said plurality of units to the electronic hardware[.]; and

a housing forming said first, second and third connection parts.

12. (UNAMENDED) A function expanding device according to claim 11, wherein said second and third connection parts are used to connect to the electronic hardware the unit connectable to the first connection part, but connect different units to the electronic hardware.

13. (UNAMENDED) A function expanding device according to claim 11, wherein said second connection part is used to connect to the electronic hardware at least one of said plurality of units connectable to the first connection part, and

wherein said third connection part is used to connect to the electronic hardware at least one of the units connectable to the first connection part, which unit is different from the unit connectable by the second connection part.